

HOEPPNER WAGNER & EVANS

ATTORNEYS AT LAW

Porter County Office
Gainer Bank Building
103 East Lincolnway
Post Office Box 2357
Valparaiso, Indiana 46384

Valparaiso (219) 464-4961
Lake County (219) 769-8995
Fax (219) 465-0603

Lake County Office
Twin Towers
1000 East 80th Place
Suite 631 South Tower
Merrillville, Indiana 46410

Merrillville (219) 769-6552
Porter County (219) 465-0432
Fax (219) 738-2349

*William H. Wagner
Larry G. Evans
William F. Satterlee, III
Gordon A. Etzler
John E. Hughes
Morris A. Sunkel
James A. Cheslek
**James L. Jorgensen
Ronald P. Kuker
Barbara A. Young
Richard A. Browne
***F. Joseph Jaskowiak

Of Counsel:
Delmar R. Hoeppner

Katharine E. Gerken
Richard M. Davis
Mark E. Schmidtke
Judith L. Garner
Todd A. Leeth
***Michael P. Blaize
*Jill Sisson
Heidi B. Jark

Administrator
Kenneth L. Stuft

*Also Admitted in Michigan
**Also Admitted in Florida
***Also Admitted in Illinois

March 5, 1990

Ms. Ruth Mancos
Emergency Support Section
U.S. ENVIRONMENTAL PROTECTION AGENCY,
5HS-11
230 South Dearborn Street
Chicago, IL 60604

Re: Request for Information Pursuant to Section 104(e)
of CERCLA and Section 3007 of RCRA, for the
Conservation Chemical Company Site, in Gary,
Indiana
Your No. 5HS-11

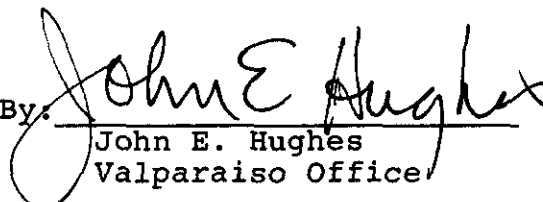
Dear Ms. Mancos:

This will confirm our telephone conversation regarding the response to the questionnaire submitted and dated January 30, 1990. We initially agreed to a response date of March 2, 1990. I subsequently learned that you would be out of the office until March 6. I was unable to complete all of the information on March 2, but enclose the response on this date with an unsigned Affidavit. The signed Affidavit should be in your office within the week.

If you have any question, please do not hesitate to contact me.

Very truly yours,

HOEPPNER, WAGNER AND EVANS

By: 
John E. Hughes
Valparaiso Office

JEH/jd
Enclosures

RESPONSE TO EPA REQUEST FOR INFORMATION
PURSUANT TO SECTION 104(e) OF CERCLA IN SECTION 3007
OF RCRA FOR CONSERVATION CHEMICAL COMPANY, INC.

Charles R. Hain, as Vice President of Finance, submits the following answers to the Request For Information dated January 30, 1990, regarding the Conservation Chemical Company site, Gary, Indiana:

1. The following persons contributed to the preparation of the answers:

Charles R. Hain	V.P. Finance
James A. Breisch	Manager Industrial Engineering
John Tyrpak	Maint. Foreman (Ret.)
Richard Zinevich	Purchasing Agent
Larry Garris	Lead Man
Ronald J. Viasaty	Midtown Petroleum
Gary Vickerman	Houghton
Brenda H. Pinkelton	Cincinnati Milikron
Ted Barg	Foreman (Ret.)
Jack Williams	Plant Engineer (Ret.)

Other current Klein employees were consulted in records searches and to determine if they had any knowledge of this period, but only the people above provided information. All of the above are located at 7200 McCormick Boulevard, Chicago, Illinois 60645, during normal business hours. The current addresses for the retired individuals are as follows:

John Tyrpak

Ted Barg

2. Conservation Chemical Company of Indiana incoming transaction sheets (copies of which are enclosed), which were supplied by counsel for the 6500 Industrial Highway Group. These documents were used as a basis to search our records, including current material safety data sheets. All documentation prior to 1980-82 has been disposed of in the normal course of our record disposal policy. We did locate booklets which were kept by a foreman entitled "Avoid Verbal Orders". These booklets contain copies of requisitions for materials and number 50 to 60. From these books, we have determined the identity of some of the products listed in answer No. 7. A sample page is enclosed for your information. If duplication of the entire set of books is necessary, we can accommodate you.

8. Enclosed are all of the liability policies that Klein Tools has been able to locate for the named period.

9-10. Pursuant to discussion with your counsel, Klein Tools presents its audited financial statement for December 31, 1988. Klein Tools, Inc. asserts a privilege of confidentiality for the reason that this contains confidential financial information relating to the condition of the company, and might give a competitive advantage to other competitors. This privilege is asserted in accordance with 40 CFR 2.203(b). Each page of the report is marked confidential.

11-12. Not applicable.

A F F I D A V I T

CHARLES R. HAIN, being duly sworn upon his oath, states:

1. He is the Vice President of Finance for Klein Tools, Inc., which is the successor in interest of Mathias Klein & Sons, Inc., and operates its manufacturing facility at the same location, 7200 McCormick Boulevard, Chicago, Illinois.

2. A diligent record search has been completed and there has been a diligent interviewing process with all present and former employees who may have knowledge of the operations, hazardous substance use, storage, treatment, releases, spills, disposal or handling practices of Klein Tools, Inc., formerly known as Mathias Klein & Sons between 1970 to 1985.

3. He has compiled the information attached in response to the EPA request dated January 30, 1990.

DATED this ____ day of March, 1990.

CHARLES R. HAIN

STATE OF ILLINOIS)
) SS:
COUNTY OF _____)

Subscribed and sworn to before me, the undersigned, a Notary Public in and for said County and State, this ____ day of March, 1990.

Notary Public

My Commission Expires: _____

County of Residence: _____

**EPA - REGION V
SUPERFUND DOCUMENT MANAGEMENT SYSTEM (SDMS)
ENFORCEMENT CONFIDENTIAL INFORMATION**

The material listed below is deemed enforcement confidential and has been redacted. Authorized staff may contact the EPA Region V Records Center for information on viewing this material. Approval for release of enforcement confidential material is granted by the Office of Regional Counsel.

SITE NAME	CONSERVATION CHEMICAL
PRP AFFILIATION	MATHIS KLEIN & SONS INC
DOCUMENT DATE(S)	
DOCUMENT TYPE	INSURANCE - POLICIES
IS THIS DOCUMENT PART OF ANOTHER DOCUMENT?	104(E) RESPONSE

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

6418343584

RECIPIENT'S COPY

From (Your Name) Please Print

Your Phone Number (Very Important)

To (Recipient's Name) Please Print

Recipient's Phone Number (Very Important)

JOHN E. HUGHES, ESQ.

(219) 464-4961

MS. RUTH MANCOS

312/353-3193

Company

Department/Floor No.

Company

Department/Floor No.

HOEPPNER WAGNER & EVANS

Street Address

Emergency Support Section

U.S. ENVIRONMENTAL PROTECTION AGENCY

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes)

5H9-11

103 E LINCOLN WAY

City

State

ZIP Required

230 South Dearborn Street

City

State

ZIP Required

VALPARAISO IN

46364

Chicago, IL

60604

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)

55540

PAYMENT 1

Bill Sender

Bill Recipient's FedEx Acct. No.

Bill 3rd Party FedEx Acct. No.

Bill Credit Card

5 Cash

SERVICES (Check only one box)

DELIVERY AND SPECIAL HANDLING

WEIGHT

YOUR DECLARED VALUE

OVER SIZE

Emp. No.

Date

Federal Express Use

Priority Overnight Service (Delivery by next business morning)

Standard Overnight Service (Delivery by next business afternoon)

1 HOLD FOR PICK-UP (Fill in box if)

2 DELIVER WEEKDAY

3 DELIVER SATURDAY (Extra charge)

4 DANGEROUS GOODS (Extra charge)

5 CONSTANT SURVEILLANCE SVC. (CSS)

6 DRY ICE

7 OTHER SPECIAL SERVICE

8 SATURDAY PICK-UP

9 HOLIDAY DELIVERY

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

11 YOUR PACKAGING

51

16 FEDEX LETTER

56 FEDEX LETTER

12 FEDEX PAK

52 FEDEX PAK

13 FEDEX BOX

53 FEDEX BOX

14 FEDEX TUBE

54 FEDEX TUBE

Economy Service (formerly Standard Air) (Delivery by second business day)

Heavyweight Service (Extra Large or any package over 150 lbs.)

75 HEAVYWEIGHT

80 HEAVYWEIGHT

30

80

30

80

30

80

Delivery commitment may be later in some areas

Declared Value Limit \$100. Call for delivery schedule

10

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80

10

80

30

80

30

80

30

80

30

80